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7 || Attorneys for Plaintiff
VERIGY US, INC.

12 || VERIGY US, INC, a Delaware Corporation

Case No. C07 04330 RMW (HRL)

13 Plaintiff,

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

Defendants.

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**PLAINTIFF'S ADMINISTRATIVE MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

CASE NO. C07 04330 RMW (HRL)

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigty U.S., Inc. (“Plaintiff”
2 or “Verigty”) requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include:

- 5 1. Portions of Plaintiff's Memorandum of Points and Authorities in Support of the
6 Application for an Order to Show Cause Re: Contempt Against Defendants Romi Mayder
7 and Silicon Test Systems, Inc.
8 2. Exhibits A through K of the Declaration of Melinda M. Morton in Support of the
9 Application.

10 These materials (hereafter “the Materials”) disclose information that has been designated
11 as “Highly Confidential—Attorneys’ Eyes Only” or “Confidential” by the parties under the
12 Protective Order, without objection to those designations (although Verigty reserves its rights to
13 challenge such designations pursuant to the Stipulated Protective Order). Although the
14 information in the Materials has been designated as protected from disclosure under the Protective
15 Order, Verigty must rely on this information in support of its Application. The parties’
16 confidentiality interest therefore overcomes the right of public access to the record, as a substantial
17 probability exists that the parties’ overriding confidentiality interest will be prejudiced if the
18 record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
19 means exist to achieve this overriding interest

20 Pursuant to Local Civil Rule 79-5(b)-(c), Verity therefore lodges the Materials with this
21 Court, and respectfully requests leave to file the aforementioned documents under seal.

Respectfully submitted,

cc || Dated: December 5, 2007

BERGESON, LLP

By: /s/

Melinda M. Morton
Attorneys for Plaintiff
VERIGY US, INC.